

UNITED STATES DISTRICT COURT

DISTRICT OF NEW MEXICO

Standard Insurance Company

Plaintiff,

2:21-cv-01226

Vs.

Richard Granger, Ryan s. Granger

And Marisa Robles

Defendant

Response

COMES NOW Richard Granger III and Ryan Granger , by and through their attorneys of record, Sanders Law Firm (John S. Hightower) and for their response states as follows:

1. Defendants deny the allegations contained in Paragraph 1 of the Complaint.
2. Defendants deny the allegations contained in Paragraph 2 of the Complaint.
3. Defendants deny the allegations contained in Paragraph 3 of the Complaint.
4. Defendants deny the allegations contained in Paragraph 4 of the Complaint.

5. Defendants deny the allegations contained in Paragraph 5 of the Complaint.
6. Defendants deny the allegations contained in Paragraph 6 of the Complaint.
7. Defendants deny the allegations contained in Paragraph 7 of the Complaint.
8. Defendants deny the allegations contained in Paragraph 8 of the Complaint.
9. The Defendants admit jurisdiction and venue of this court are proper.
10. Defendants deny the allegations contained in Paragraph 11 of the Complaint.
11. Defendants deny the allegations contained in Paragraph 12 of the Complaint.
12. Defendants deny the allegations contained in Paragraph 13 of the Complaint.
13. Defendants deny the allegations contained in Paragraph 14 of the Complaint.
14. Defendants deny the allegations contained in Paragraph 15 of the Complaint.
15. Defendants deny the allegations contained in Paragraph 16 of the Complaint.
16. Defendants deny the allegations contained in Paragraph 17 of the Complaint.

17. Defendants deny the allegations contained in Paragraph 18 of the Complaint.

18. Defendants deny the allegations contained in Paragraph 19 of the Complaint.

19. Defendants deny the allegations contained in Paragraph 20 of the Complaint.

20. Defendants deny the allegations contained in Paragraph 21 of the Complaint.

21. Defendants deny the allegations contained in Paragraph 22 of the Complaint.

22. Defendants deny the allegations contained in Paragraph 23 of the Complaint.

23. The Defendants deny all other allegations.

24. The Defendants deny the prayer requested by the Petitioner.

#### **AFFIRMATIVE DEFENSES**

The Complaint fails to state a claim upon which relief may be granted. In addition, Plaintiff claims are barred by the statute of frauds, waiver, estoppel, unclean hands, bad faith and laches.

#### **Prayer**

Wherefore, defendants Richard Granger III and Ryan Granger pray the court deny the petition, place the funds in deposit in court and award them to to Richard Granger III and Ryan Granger and any other relief that justice so requires.

SANDERS, BRUIN, COLL & WORLEY, P.A

/s/ John S. Hightower

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